

JOHN W. HUBER, United States Attorney (#7226)
 CRISTINA P. ORTEGA, Assistant United States Attorney (#9567)
 Attorneys for the United States of America
 111 South Main Street, Ste 1800 • Salt Lake City, Utah 84111
 Telephone: (801) 524-5682 • Facsimile: (801) 325-3387

IN THE UNITED STATES DISTRICT COURT
 DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,	:	Case No. 1:20-cr-00023
	:	
Plaintiff,	:	
	:	FIRST CERTIFICATE OF COMPLIANCE
v.	:	AND REQUEST FOR RECIPROCAL
	:	DISCOVERY
MARIAH KEISHA BUTLER,	:	
	:	
Defendant.	:	Judge: NIELSON

The United States of America, through its counsel, hereby files its first certificate of compliance with its discovery obligations in this case and request for reciprocal discovery from the defendant.

The United States gives notice that the following, in accordance with FRCP 16(a)(1)(E), is being or has been provided to counsel for the defendant via USAfx:

<u>Involved Parties</u>	<u>Description</u>	<u>Beginning Bates</u>	<u>Ending Bates</u>
Butler, Mariah	Intel Packet	IP-MB-01-00001	IP-MB-01-00005.28
Butler, Mariah	Wage Data	IP-MB-02-00001	IP-MB-02-00001.03
Butler, Terrell	Intel Packet	IP-TB-01-00001	IP-TB-01-00003.02
Butler, Terrell	Wage Data	IP-TB-02-00001	IP-TB-02-00001.03
<u>LEO Reports</u>			
FBI	302's, Diagram, Photo Log, Subject ID	RPT-FBI-01-00001	RPT-FBI-01-00009
Child Exploitation TFO	TFO Supplemental Reports	RPT-CETF-01-00001	RPT-CETF-01-00003
Winnebago Co Sheriff	Report no. L-WI-2020-02-10-0000613-001	RPT-WCS-01-00001	RPT-WCS-01-00001.04

<u>Warrants/Subpoenas</u>			
Subpoena no. 580619	Kik Data	S-01-00001	S-01-00001.05
Subpoena no. 582900	Comcast Data	S-02-00001	S-02-00001.05
Warrant no. 2.20mj150	Residence, 301 N. 1500 E. Layton UT	SW-01-00001	SW-01-00002.02
<u>Electronic Data/Records</u>			
Comcast	Butler, Terrell Subscriber Info	ED-C-TB-01-00001	ED-C-TB-01-00001.02
Comcast	Falletta, Brandon Subscriber Info	ED-C-BF-01-00001	ED-C-BF-01-00001.02
Comcast	Walker, Sophia Subscriber Info	ED-C-SW-01-00001	ED-C-SW-01-00001.02
Kik	amsweetie16_ga5 Subscriber Data	ED-KIK-MB-01-00001	ED-KIK-MB-01-00002.104
Social Media Research	Butler, Mariah	ED-SM-MB-01-00001	ED-SM-MB-01-00001
<u>Photographs</u>			
Butler, Mariah	Driver's License Photograph	PH-01-00001	PH-01-00001
Residence, Outside	301 N. 1500 E. Layton UT	PH-02-00001	PH-02-00003
Residence, Search	301 N. 1500 E. Layton UT	PH-03-00001	PH-03-00081
<u>Audio & Video</u>			
Officer Body Camera	Layton PD	AV-OBC-01-00001	AV-OBC-01-00001
Butler, Mariah	Interview 2/26/20	AV-MB-01-00001	AV-MB-01-00001
Butler, Mariah	Conversation with Terrell 2/26/20	AV-MB-02-00001	AV-MB-02-00001
MR	Interview 04/07/2020	AV-MR-01-00001	AV-MR-01-00001

As additional discoverable material becomes available, such material will be provided within a reasonable time. Throughout this case, the United States will provide material discoverable under Rules 16 and 26.2 of the Federal Rules of Criminal Procedure and the Jencks Act without requiring the Defendants to make a specific request for such material.

Upon the request of the Defendants, the United States will permit and facilitate the Defendants own inspection, copying or photographing of those items described/defined in Rule 16(a)(1)(E).

The United States also hereby requests disclosure of evidence by the Defendants (also known as reciprocal discovery) pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure and DUCrimR 16-1(c). By providing Rule 16 discovery without requiring a specific request from the defense, the United States invokes a reciprocal obligation on the Defendants under DUCrimR

16-1(c), which states that the Defendants must allow the government to inspect and to copy the following, as further defined in Rule 16 of the Federal Rules of Criminal Procedure:

- a. Documents and tangible objects the defendant intends to introduce as evidence at trial;
- b. Reports of examinations and tests the defendant intends to introduce at trial or that were prepared by a witness whom the defendants intends to call at trial; and
- c. A written summary of the testimony of any expert the defendants intend to use a trial under Federal Rules of Evidence 702, 703 and 705.

The United States requests that the Defendants provide to the government at a reasonable time before trial, but no later than five working days before trial, copies of the material referenced in this paragraph. Further, the United States requests continuing compliance with the reciprocal discovery following the initial disclosure.

The United States also hereby requests all written and recorded statements by any witness other than the Defendants whom the Defendants intends to call at trial or a hearing covered by the Jencks Act or Rule 26.2 of the Federal Rules of Criminal Procedure.

DATED this 18th day of June, 2020.

JOHN W. HUBER
United States Attorney

/S/ Cristina P. Ortega

CRISTINA P. ORTEGA
Assistant United States Attorney

CERTIFICATE OF SERVICE

I certify that on the 18th day of June, 2020, the FIRST CERTIFICATE OF COMPLIANCE AND REQUEST FOR RECIPROCAL DISCOVERY was filed electronically to the District Court, and caused to be served via USAfx, to the following:

Wendy M. Lewis
Attorney for Mariah Butler
46 West Broadway, Suite 110
Salt Lake City, Utah 84101

/S/ Emily Gaitin

Emily Gaitin
Certified Paralegal